

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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PROCT
EFF. Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: PAUL G. SECKAR
(OCA/USPS-T2-19-20)
(JANUARY 25, 1999)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

Shelley S. Dreifuss
Attorney

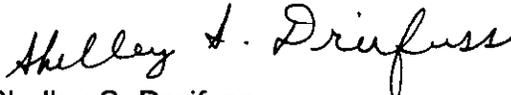


OCA/USPS-T2-19. Please refer to Worksheet 1, page 1, of Revised Response of USPS Witness Seckar to Question Posed by Presiding Officer at the November 20, 1998 Hearing, dated January 14, 1999. For line (6) "Information Systems-Variable," shouldn't your cited source be Worksheet 2, not Table 15?

OCA/USPS-T2-20. Please refer to Worksheet 1, page 2, and Worksheet 2, of Revised Response of USPS Witness Seckar to Question Posed by Presiding Officer at the November 20, 1998 Hearing, dated January 14, 1999. Also refer to the Commission's holding in PRC Op. MC97-5 at 47 that the start-up costs of a new service should be recovered as part of the attributable costs of the service (and then marked up). Please confirm that, in conformance to the Commission's approach in MC97-5, the unit attributable Information Systems cost for MOL, including start-up costs, would be \$0.0041 (computed by the simple addition of the unit one-time cost of \$0.0020 to the unit variable cost of \$0.0021). If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
January 25, 1999